

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND

GOVERNMENT EMPLOYEES HEALTH  
ASSOCIATION, on behalf of itself and all  
others similarly situated,

Plaintiff,

v.

ACTELION PHARMACEUTICALS LTD.,  
*et al.*,

Defendants.

Case No. 18-cv-3560-GLR

**MOTION FOR LEAVE TO FILE MATERIALS PROVISIONALLY UNDER SEAL**  
**PURSUANT TO LOCAL RULES 104.13 AND 105.11 AND THE STIPULATED**  
**PROTECTIVE ORDER**

Plaintiff Government Employees Health Association (“GEHA”) respectfully moves for leave to file its Motion for Spoliation-Related Sanctions and attachments provisionally under seal. Pursuant to Section 2.D.ii of the Court-ordered Stipulated Protective Order (Dkt. No. 80), “[d]ocuments containing or describing Confidential Material may be provisionally filed under seal, with redacted versions filed publicly within 14 days thereafter.” The Motion and attachments include information which Defendants have designated as Confidential Material pursuant to the Stipulated Protective Order. The Stipulated Protective Order further provides that the party seeking to file documents under seal must simultaneously submit a proposed “order pursuant to Local Rule 105.11 of this Court.” Accordingly, Plaintiff GEHA respectfully requests that the Court enter the attached proposed Order granting leave to file the Motion and attachments under seal on a provisional basis and to thereafter file public versions that redact or seal only the Confidential Materials.

Dated: November 21, 2022

Respectfully submitted,

/s/ Sharon K. Robertson

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**CERTIFICATE OF SERVICE**

I, Sharon K. Robertson, hereby certify that I caused a copy of the foregoing to be filed electronically via the Court's CM/ECF system. Those attorneys who are registered CM/ECF users may access the foregoing, and notice will be sent to those parties by operation of the CM/ECF system. The materials being filed provisionally under seal on the Court's ECF system will be served on all parties via e-mail.

Dated: November 21, 2022

/s/ Sharon K. Robertson  
Sharon K. Robertson